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22 SEIU United Healthcare Workers - West
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24 UNITED STATES OF AMERICA
25 NATIONAL LABOR RELATIONS BOARD
26 REGION 31
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28 SEIU UNITED HEALTHCARE WORKERS -
WEST,

Case No. 31-CA-140827

Charging Party,

and

PRIME HEALTHCARE CENTINELA, LLC -
d/b/a CENTINELA HOSPITAL MEDICAL
CENTER,

Respondent.

SEIU UNITED HEALTHCARE WORKERS -
WEST,

Case No. 31-CA-140844

Charging Party,

and

1 PRIME HEALTHCARE CENTINELA, LLC –
2 d/b/a CENTINELA HOSPITAL MEDICAL
3 CENTER,

4 Respondent.

5 SEIU UNITED HEALTHCARE WORKERS -
6 WEST,

Case No. 31-CA-141016

7 Charging Party,

8 and

9 PRIME HEALTHCARE CENTINELA, LLC –
10 d/b/a CENTINELA HOSPITAL MEDICAL
11 CENTER,

12 Respondent.

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15 **CHARGING PARTY'S CROSS-EXCEPTIONS TO THE DECISION OF THE**
16 **ADMINISTRATIVE LAW JUDGE**
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The Charging Party hereby files the following Cross-Exceptions to the Decision of the Administrative Law Judge ("ALJ").

<u>No.</u>	<u>Exception</u>	<u>Language</u>
1.	Page 7:36-40	To the failure of the ALJ to find that Schottmiller was not only not credible, but that she intentionally lied on this occasion.
2.	Page 16:20-30 Conclusions of Law	To the failure of the ALJ to find that the employer's conduct violated Section 8(d).
3	Page 13:12-16:17	To the conclusion that the parties did not reach an agreement to eliminate the California Differential from the collective bargaining agreement. In partial agreement with the Respondent, Charging Party asserts that the parties agreed to eliminate the California Differential from the collective bargaining agreement. A complete collective bargaining agreement was reached, which did not include the California Differential.
4.	Page 17:1-27 Remedy	To the remedy in its entirety.
5.	Page 17:1-27	To the failure of the ALJ to include various remedies including additional notice readings, posting of Board notices, reimbursing the Union for its costs and expenses, and other remedies.
6.	Page 17:1-27	To the failure of the ALJ to order that Prime execute the Agreement and comply with it.
7.	Page 17:30-18:28 Order	To the Order in its entirety for its failure to provide an adequate remedy.

Dated: April 14, 2016

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: /s/ DAVID A. ROSENFELD
DAVID A. ROSENFELD
BRUCE A. HARLAND
MONICA T. GUIZAR

Attorneys for Charging Party
SEIU United Healthcare Workers - West

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**PROOF OF SERVICE
(CCP §1013)**

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years and not a party to the within action.

On April 14, 2016, I served the following documents in the manner described below:

**CHARGING PARTY'S CROSS-EXCEPTIONS TO THE DECISION OF THE
ADMINISTRATIVE LAW JUDGE**

- X (BY U.S. MAIL) I am personally and readily familiar with the business practice of Weinberg, Roger & Rosenfeld for collection and processing of correspondence for mailing with the United States Parcel Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Alameda, California.
- X (BY ELECTRONIC SERVICE) By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from rfortier-bourne@unioncounsel.net to the email addresses set forth below.

On the following part(ies) in this action:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 14, 2016, at Alameda, California.

/s/ Rhonda Fortier-Bourne
Rhonda Fortier-Bourne

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